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*Attorneys for Plaintiff and Counter Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHEMEON SURFACE TECHNOLOGY, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

METALAST INTERNATIONAL, INC., a Nevada  
corporation; METALAST, INC., a Nevada  
corporation; SIERRA DORADO, INC., a Nevada  
corporation; DAVID M. SEMAS, an individual;  
GREG D. SEMAS, an individual; and WENDI  
SEMAS-FAURIA, an individual.

Defendants.

DAVID M. SEMAS; and METALAST  
INTERNATIONAL, INC.,

Counterclaimants,

v.

CHEMEON SURFACE TECHNOLOGY, LLC,  
DEAN S. MEILING; and MADYLON  
MEILING,

Counter Defendants.

Case No.: 3:15-cv-00294-MMD-VPC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO GREG SEMAS'S  
RENEWED MOTION FOR SUMMARY  
JUDGMENT [DKT 427]**

**[FIRST REQUEST]**

CHEMEON SURFACE TECHNOLOGY, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

MHA GROUP, a company; and MARC HARRIS,  
an individual.

Defendants.

Consolidated with:

Case No. 3:15-cv-00295-MMD-VPC

Plaintiff CHEMEON Surface Technology (“CHEMEON”), by and through its undersigned  
counsel, Timothy A. Lukas of Holland & Hart, LLP; and Defendant Greg Semas (“Semas”), by and  
through his undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate  
and agree as follows:

1. On July 25, 2018, Semas filed a Renewed Motion for Summary Judgment (Dkt. 427)  
 (“Motion”).

2. CHEMEON’s deadline to file a response to the Motion is currently August 15, 2017.

3. CHEMEON and Semas hereby stipulate to extend the deadline for CHEMEON to respond  
to the Motion to September 7, 2018.

4. This is CHEMEON’s first request for an extension of time to file a response to the  
Motion.

5. Pursuant to LR IA 6-1, this first request for an extension is made with good cause  
and in good faith and not for purposes of delay. Because of the unavailability of CHEMEON’s counsel  
during periods of August, it be would very difficult and impose an undue burden on their client and  
counsel to meet the current filing deadline for filing an opposition to Greg Semas’ renewed motion  
for summary judgment in this case. Counsel do not believe that the short extension requested would  
cause any undue delay in this case. CHEMEON’s counsel believes the extension allows for a better  
and more complete resolution of the pending motion and claims that may ultimately have to tried  
to the Court.

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IT IS SO STIPULATED.

DATED this 9th day of August, 2018.

HOLLAND & HART LLP

/s/ Timothy A. Lukas  
Robert C. Ryan (7164)  
Timothy A. Lukas (#4678)  
Tamara Reid (9840)  
5441 Kietzke Lane, Second Floor  
Reno, Nevada 89511  
*Attorneys for Chemeon Surface Technology*

DATED this 9th day of August, 2018.

HOY CHRISSINGER KIMMEL PC

/s/ Michael D. Hoy  
Michael D. Hoy (2723)  
Bank of America Tower  
50 West Liberty Street, Suite 840  
Reno, Nevada 89501  
Telephone: (775) 786-8000  
Facsimile: (775) 786-7426  
*Attorneys for Greg D. Semas*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: August 9, 2018

**HOLLAND & HART LLP**  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511  
Phone: (775) 327-3000 ♦ Fax: (775) 781-1111

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

On August 9, 2018, I served the foregoing, **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO GREG SEMAS’S RENEWED MOTION FOR SUMMARY JUDGMENT [DKT 427] [FIRST REQUEST]**, as follows:

Michael D. Hoy  
HOY CHRISSINGER KIMMEL  
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50 West Liberty Street, Suite 840  
Reno, Nevada 89501  
Telephone: (775) 786-8000  
Facsimile: (775) 786-7426  
[mhoy@nevadalaw.com](mailto:mhoy@nevadalaw.com)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on August 9, 2018.

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